

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Trudy B. Grant, Sarah Krawcheck,)
Nashonda Hunter, Max Milliken,)
Jordan Mapp, and Caleb Clark,)

Plaintiffs,)

v.)

Howard Knapp as the Executive)
Director of the South Carolina)
Election Commission, Dennis Shedd)
(Chair), JoAnne Day, Clifford J.)
Edler, Linda McCall and Scott)
Moseley, as Members of the South)
Carolina Election Commission, and)
Charleston County Board of)
Elections and Voter Registration,)

Defendants.)

Case No.: 2:23-cv-06838-BHH

Plaintiff Grant's Answers to State Defendants' First Interrogatories

Plaintiff Trudy B. Grant provides the following answers to Election Defendants' First Set of Interrogatories.

Definitions and Instructions are as specified in the Interrogatories, with the following supplementation:

ANSWERS

1. For each of the Plaintiffs, state your full name, any/and all prior names, including aliases or nicknames, dates of birth, Social Security numbers, your current address, and all addresses for the years 2008 through the present. For each address, document the inclusive months and years you lived at each address and whether you owned or rented each address.

Answer: Trudy Bouvier Grant; Plaintiff Grant has also been known as Truby Bouvier Lucas; DOB [REDACTED] 55; SSN: [REDACTED]. Current address: [REDACTED] Summerville, SC 29485 (family-owned).

Prior addresses:

[REDACTED] North Charleston, SC 29418 (owned) (2008-2016); and
[REDACTED] Ladson, SC 29456 (rent) (2016-2022).

2. For each of the Plaintiffs, describe the date and the precinct, county, and state in which you are or have been registered to vote for the years 2008 through the present. Document the inclusive months and years you were registered to vote in each precinct, county, and state.

Answer: Plaintiff Grant was registered in the precinct that voted at Lambs School from 2008-2016. Since then, Plaintiff Grant has been registered in the Ladson precinct, Charleston, SC.

3. For each of the Plaintiffs, describe every election in which you voted by year and type of election, (*e.g.* primary, general, special).

Answer: Voted in 2010 (general), 2016 (general), 2018 (primary and general), 2020 (presidential primary, state primary and general), 2022 (primary and general), 2024 (presidential primary).

Plaintiff Grant is also confident that she has voted regularly in general, including the primary and general election in 2008 and 2012.

4. For each of the Plaintiffs, for every election described in response to Interrogatory number 3, indicate:

- a. the method of voting you used; and
- b. whether you requested an absentee ballot application, and if so, the county board of voter registration and elections to which the request was made, the absentee application excuse identified on the request, whether the application was granted or denied, and if denied, the reason for the denial.

Answer:

- a. I have always voted on a machine, either at the poll on Election Day or at a central location for Early Voting. In several elections, I voted Absentee at a central location (not by mail), and my reason was that I would be out of the county on Election Day.

- b. I have never requested a mail-in ballot.

5. For each of the Plaintiffs, describe all election(s) in which you were unable to cast a ballot because you could not vote absentee by mail and the reason you were unable to cast a ballot on election day in this election.

Answer: None.

6. For each of the Plaintiffs, describe your employment status for the years 2008 through the present. For each employer or school listed, document the inclusive months and years you were employed or in school, the address of the employer or school, and the date of graduation if applicable.

Answer:

2008-2010 – Roper St. Francis Hospital, West Ashley

2010 – May 2014 – NAACP, 4805 Mt. Hope Road, Baltimore, MD

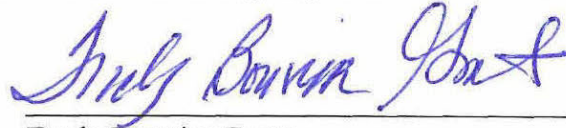
June 2014 – present – National Action Network, @ Charity Missionary Baptist Church

2008 – present - Charity Missionary Baptist Church, 1544 East Montague Ave, N. Chas, SC

7. For each of the Plaintiffs, state whether you contend that you currently qualify or have ever qualified to vote absentee under S.C. Code Ann. §§ 7-15-110, 7-15-320, 7-15-600, *et. seq.*, or any other current or former provision of Title 7 of the S.C. Code Ann., and describe the qualification.

Answer: No, except that in the past, Plaintiff Grant sometimes qualified for being out of the County on Election Day.

Under penalty of perjury, I declare that the foregoing answers are true and correct.



Trudy Bouvier Grant

7/10/24

Date

Date: July __, 2024

s/Armand Derfner

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